

TIFFANY & BOSCO

P.A.
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Attorney for Movant: U.S. Bank National Association

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – RIVERSIDE DIVISION

In re:

Shamicka Lawrence aka Shamicka Gibbs,

Debtor.

Case No.: 6:23-bk-15163-WJ

Chapter: 7

**SUPPLEMENTAL ATTORNEY
DECLARATION IN SUPPORT OF
MOTION FOR RELIEF FROM THE
AUTOMATIC STAY**

Hearing:

Date: January 9, 2025

Time: 10:00 a.m.

Ctrm: 304

Place: 3420 Twelfth Street, Riverside, CA 92501

I, Richard L. Stevenson, declare under penalty of perjury as follows:

1. I am an Attorney for U.S. Bank National Association (“Movant”). In such capacity, I am authorized to make this declaration on behalf of Movant, with respect to the above-captioned matter.

2. On May 17, 2024, Movant filed its Motion for Relief from the Automatic Stay in the instant case as Docket No. 86 (the “First MFR”). The First MFR was scheduled to come on for hearing on June 20, 2024.

3. The First Motion was unopposed and ultimately granted via a Scheduling Order entered on June 17, 2024, as Docket No. 103.

1 4. Due to an inadvertent calendaring error, the Order Granting Motion for Relief from the
2 Automatic Stay was not timely submitted to the Court for the Judge's review and execution.

3 5. Subsequently, due to Movant's lack of prosecution, the Court entered an Order
4 Denying the Motion for Relief from the Automatic Stay without prejudice on July 8, 2024, as Docket
5 No. 106 (the "Order Denying MFR"). The Order Denying MFR directed Movant to re-file its motion.

6 6. Upon receipt of the Order Denying MFR, Movant proceeded with steps necessary to
7 re-file its Motion for Relief from the Automatic Say, pursuant to the Order Denying MFR. Attorney
8 for Movant re-filed the Motion for Relief from the Automatic Stay on August 1, 2024, as Docket No.
9 108, with a hearing set for August 29, 2024 (the "Second MFR").

10 7. The hearing on the Second MFR was subsequently continued to September 26, 2024,
11 whereby the motion was denied by the court order entered on September 26, 2024, as Docket No. 119.

12 8. Movant, through its attorney, apologizes to the Court for inadvertently missing the
13 deadline to file the relief order in the First MFR, for failing to submit an updated supporting declaration
14 in support of the Second MFR, and for failing to submit an initial supplemental attorney declaration
15 in support of the Second MFR, pursuant to 9013-1(L).

16 9. Movant has now filed its Motion for Relief from the Automatic Say (the "Third MFR")
17 on December 17, 2024 as Docket No. 126, that includes Movant executing an updated declaration in
18 support of the Third MFR.

19 10. Attorney for Movant hereby submits this supplemental declaration pursuant to 9013-
20 1(L), advising why the Third MFR is being filed.

21 I declare under penalty of perjury under the laws of the United States of America that the
22 foregoing is true and correct.

23 Executed this 17th day of December 2024, in San Diego, CA.

24
25 /s/ Richard L. Stevenson
26 Richard L. Stevenson
27
28

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

Tiffany & Bosco, P.A., 7720 North 16th Street, Suite 300, Phoenix, Arizona 85020

A true and correct copy of the foregoing document entitled (*specify*):

• **SUPPLEMENTAL ATTORNEY DECLARATION IN SUPPORT OF MOTION FOR RELIEF FROM THE
AUTOMATIC STAY**

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) December 17, 2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

DEBTOR'S ATTORNEY: Marc A Lieberman marc.lieberman@flpllp.com, safa.saleem@flpllp.com, addy@flpllp.com

CHAPTER 7 TRUSTEE: Arturo Cisneros (TR) amctrustee@mclaw.org, acisneros@iq7technology.com, ecf.alert+Cisneros@titlexi.com

CHAPTER 7 TRUSTEE'S ATTORNEY: D Edward Hays ehays@marshackhays.com, ehays@ecf.courtdrive.com, alinares@ecf.courtdrive.com, cmendoza@marshackhays.com, cmendoza@ecf.courtdrive.com

CHAPTER 7 TRUSTEE'S ATTORNEY: Tinho Mang tmang@marshackhays.com, tmang@ecf.courtdrive.com, alinares@ecf.courtdrive.com, cmendoza@ecf.courtdrive.com

U.S. TRUSTEE: United States Trustee (RS), ustregion16.rss.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On (*date*) December 17, 2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

JUDGE: Honorable Wayne Johnson, United States Bankruptcy Court, Central District of California, 3420 Twelfth Street, Suite 384, Riverside, CA 92501-3819

DEBTOR: Shamicka Lawrence, 11364 Estates Court, Riverside, CA 92503

CO-OWNER: Coastal Massage Oxnard, Inc., 11801 Pierce St., Suite 200, Riverside, CA 92505

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

December 17, 2024
Date

Cortney Massey
Printed Name

/s/ Cortney Massey
Signature